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6 Attorneys for Defendants  
7 Chase Home Finance, LLC (on behalf of itself and as successor  
in interest to Chase Manhattan Mortgage Corporation) and  
8 James Boudreau

9  
10 UNITED STATES DISTRICT COURT  
11  
12 SOUTHERN DISTRICT OF CALIFORNIA

13 CHRISTOPHER CLARK and JAMES  
14 RENICK, individuals,

15 Plaintiffs,

16 v.

17 CHASE HOME FINANCE, LLC; a Delaware  
18 LLC doing business in California; CHASE  
19 MANHATTAN MORTGAGE  
CORPORATION, a New Jersey corporation  
doing business in California; JAMES  
BOUDREAU, an individual; and DOES 1-25,

Defendants.

Case No. 08 CV 0500 JM RBB

**DECLARATION OF JAMES  
BOUDREAU IN SUPPORT OF  
DEFENDANTS' OPPOSITION TO  
PLAINTIFFS' MOTION TO  
REMAND TO STATE COURT**

Date: May 16, 2008  
Time: 1:30 p.m.  
Courtroom: 16

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1 I, James Boudreau, hereby declare:

2 1. I am an Applications Developer and a current employee of JP Morgan Chase  
 3 Bank. I am also an individually named defendant in this case. I make this declaration in support  
 4 of Defendants' Opposition To Plaintiffs' Motion To Remand To State Court. The facts set forth  
 5 in this declaration I know to be true of my own personal knowledge, except where such facts are  
 6 stated to be based on information and belief, and those facts I believe to be true. If called as a  
 7 witness I could and would testify competently to the matters set forth in this declaration.

8 2. I am not (and never have been) a corporate officer or director of Chase Home  
 9 Finance, LLC, or of Chase Home Mortgage Corporation when that company was in existence.

10 3. During the time that Plaintiffs Christopher Clark and James Renick worked for  
 11 Chase Home Mortgage Corporation and Chase Home Finance, LLC, I was not their employer. I  
 12 did not have decision-making responsibility for the compensation policies that governed their  
 13 employment, nor the determination as to whether or not they were considered exempt employees.

14 4. I am not, and have never been, the alter-ego of Chase Home Mortgage Corporation  
 15 or Chase Home Finance, LLC. I have never had any commingled funds or other assets with  
 16 either Company. I have never taken on liability for the debts of Chase Home Mortgage  
 17 Corporation or Chase Home Finance, LLC, and those companies have never taken on liability for  
 18 my debts. I am not, and have never been, the equitable owner of Chase Home Mortgage  
 19 Corporation or Chase Home Finance, LLC.

20 5. Although I was an employee of Chase Home Finance, LLC, and of Chase Home  
 21 Mortgage Corporation when that company was in existence, I personally have never employed  
 22 any of the employees of either Company. I also do not have, and have never had, any of my own  
 23 personal officers or directors.

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1       6. Neither Chase Home Mortgage Corporation nor Chase Home Finance, LLC is a  
2 mere shell or conduit for my affairs. I am not (and have never been) a majority shareholder of  
3 Chase Home Mortgage Corporation, Chase Home Finance, LLC, JP Morgan Chase Bank, JP  
4 Morgan Chase & Co., or any other parent company to Chase Home Mortgage Corporation or  
5 Chase Home Finance, LLC.

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7       Executed on May 1, 2008, in the City of San Diego, State of California.

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9       I declare under penalty of perjury under the laws of the State of California and these  
10 United States that the foregoing is true and correct.

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James Boudreau

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